

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

In re

HERBERT L. WHITEHEAD, III

Debtor.

No. 22-40098

OBJECTION TO EXEMPTIONS

Kathryn A. Ellis, the Chapter 7 Trustee herein, hereby objects to the exemptions of the debtor as described below:

1. To the extent that the debtor is attempting to claim an exemption in excess of the value permitted by federal or state law, the Trustee objects to the assertion of such an exemption;
2. To the extent that the debtor is attempting to claim an exemption for property for which no exemption is permitted under federal or state law, the Trustee objects to the assertion of such an exemption, including but not limited to:
 - a. The debtor's claim of exemption pursuant to RCW 6.13.030 in the real property located at 2419 199TH Ave. Ct. E., Lake Tapps, Washington, where the debtor voluntarily transferred an interest in the real property to Wren, pursuant to 11 U.S.C. § 522 (g), where the transfer was voluntary notwithstanding the debtor now seeks to contest the voluntary transfer; and
 - b. The debtor's claim of exemption in the firearms as "household goods" pursuant to RCW 6,15,010 (1) (d) (I);
3. To the extent that the debtor does not describe an asset or other item of property

1 for which an exemption is claimed with particularity, the Trustee objects to the assertion of such
2 an exemption;

3 4. To the extent that the actual value of an asset exceeds the valuation of the asset by
4 the debtor, the Trustee objects to the claim of any exemption; and

5 5. To the extent that the debtor has not provided information and/or documentation
6 to the Trustee and/or have failed to cooperate with the Trustee regarding the investigation of his
7 financial affairs and/or concealed any property, the Trustee objects to any claims of exemption by
8 the debtor.
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10 The Trustee is objecting, in part, to preserve her rights to object pending receipt of more
11 information about the debtor's assets. The Trustee reserves the right to assert any other basis for
12 her objection or otherwise amend this objection as she may determine to be appropriate at a later
13 date.
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15 DATED this 20st day of July, 2023.

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17 By: /s/ Kathryn A. Ellis
18 Kathryn A. Ellis, Trustee

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